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20 **UNITED STATES DISTRICT COURT**  
21 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

22 Nicholas Acedo, et. al.,  
23 Plaintiffs,  
24 v.  
25 City of Los Angeles,  
26 Defendant.

Case No. 2:23-cv-04482

**PLAINTIFFS' BRIEF RE:  
COURT'S ORDER DURING THE  
PARTIES' SEPTEMBER 12, 2025  
STATUS CONFERENCE**

Assigned to the  
Hon. Cynthia Valenzuela

1 Like Defendant, Plaintiffs, Nicholas Acedo, *et. al.*, submit this filing out of  
2 caution in response to the Court's order during the parties' September 12,  
3 2025 Status Conference, which required the parties to submit a joint filing  
4 containing proposed mediators and discovery deadlines for this matter. If the  
5 Court grants the parties' joint stipulation (Doc. No. 72), Plaintiffs will also  
6 withdraw their brief and submit a joint brief with Defendants.

7 **A. Proposed Mediators**

8 At this time, counsel for Plaintiffs, who do not reside in California, do not  
9 have any proposed mediators for the Court as they continue to confer with  
10 their contacts in the Los Angeles area on individuals who would be best suited  
11 to handle an FLSA matter involving these issues and this number of Plaintiffs. If  
12 permitted, Plaintiffs will be able to submit proposed mediators for the Court on  
13 or before October 3, 2025. But the primary reason Plaintiffs requested  
14 additional time to file this brief was to obtain additional recommendations for  
15 proposed mediators.

16 **B. Proposed Dates and Deadlines**

17 Plaintiffs join in and adopt the (1) Proposed Trial Dates and Deadlines  
18 and (2) Proposed Deadlines for MSJ Briefing submitted by Defendant (Doc. No.  
19 73).

20 **C. Plaintiffs' Proposed Discovery**

21 If discovery is reopened by the Court, Plaintiffs intend to take the  
22 30(b)(6) of Defendant, as referenced in Defendant's filing. In addition, Plaintiffs  
23 may also take the depositions of the following individuals: (1) Matthew Conroy,  
24 (2) Tyler Dixon, (3) Joseph Everett, (4) Shaun Gath, (5) Jason Hing, (6) Nam  
25 Nguyen (7) Eric Talamantes, (8) Orin Saunders, (9) Arturo Tarango, (10)  
26 Timothy Wuerfel, and (11) Yuri Zaich.

27 Apart from the 30(b)(6) deposition, Plaintiffs anticipate that each of the  
28 remaining depositions will average less than 4 hours. The reason for the high

1 number of depositions is that a number of these individuals were identified by  
2 Defendant after discovery closed on this matter on November 1, 2024. For  
3 instance, Conroy, Wuerfel, and Zaich were first identified by Defendant in their  
4 December 18, 2024 supplemental disclosures. Everett, Gath, Bguyen, and  
5 Saunders were first identified by Defendant in their August 22, 2025  
6 supplemental disclosures.

7 If permitted, Plaintiffs will take additional written discovery if the Court  
8 reopens discovery in this matter. The primary reason why Plaintiffs will need  
9 this additional written discovery is because they recently obtained a Los  
10 Angeles Fire Department memo that is dated April 14, 2025, which Plaintiffs  
11 believes is dispositive on the issue of liability. This memo was not previously  
12 identified or provided by Defendant. Plaintiffs intend to seek ESI related to this  
13 and other documents that discuss the information that is contained within that  
14 April 14, 2025 memo. In addition, Plaintiffs will issue additional written  
15 discovery relating to the documents Defendant provided to Plaintiffs, in  
16 response to Plaintiffs' first written discovery requests, on December 6, 2024  
17 and December 20, 2024 (which again, occurred after discovery closed on this  
18 matter on November 1, 2024). Plaintiffs will serve Defendant with this  
19 additional written discovery within 7 days of an Order that reopens discovery.  
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Respectfully submitted,

/s/ Sammy Sugiura

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Date: September 26, 2025